

IN THE UNITED STATES DISTRICT COURT

For the

WESTERN DISTRICT OF MISSOURI

UNITED STATES OF AMERICA

v.

DAVID L. ROBINSON et.al.

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Case No. 07-00390-CR-W-DW

JUDGE DEAN WHIPPLE

**OBJECTIONS TO THE GOVERNMENT'S SUGGESTIONS IN RESPONSE TO
MOTION TO QUASH SUBPOENAS ISSUED
TO KENNETH KNAPP AND LINDA SULLINS**

Kenneth Knapp, (subpoenaed witness) in the above captioned matter, hereby respectfully objects to the U.S. Attorney's suggestions that I have been less than forthcoming in the above referenced case. In all due respect to this court and the law, I have in fact fully disclosed all of the details in this matter to the best of my recollection and ask this court to take judicial notice of such.

I **SPECIFICALLY OBJECT** to the U.S. Attorney's statement in the last sentence of Section 4 in the "SUGGESTIONS IN RESPONSE" where he erroneously states, "Mr. Knapp adamantly stated that neither he nor Ms. Sullins were going to come to Kansas City to testify." I clearly stated in Part A) of my MEMORANDUM IN SUPPORT, second sentence, "Mr. Knapp and Ms. Sullins will comply with this subpoena if the Judge in this matter so orders them to appear." Furthermore, it is on record that I, and Linda Sullins spoke with Tina Sutter (Victim Witness Specialist) to coordinate travel arrangements in the event our presence was required at the trial.

Page One

OBJECTIONS TO THE GOVERNMENT'S SUGGESTIONS

I **SPECIFICALLY OBJECT** to the U.S. Attorney's misleading statement in Section 3 where he states, "The evidence at trial is expected to show that Defendant Goodyke provided the Diplomatic Identification Cards to Mr. Knapp and Ms. Sullins and that Defendant Robinson obtained the Apostille from the Kansas Secretary of State's Office for **these** identification cards." (Emphasis mine) FBI agent Craig Byrkit called me the day following his in person visit about a year ago, and requested I fax him copies of the Apostille's (Act of State documents). (See Section H of MEMORANDUM IN SUPPORT). I **immediately complied with his request**. **My Apostille document** has the Secretary of State of Nevada's signature and seal on it indicating it was processed in Nevada, not Kansas as implied by the U.S. Attorney. This is referenced in Section D of the Memorandum In Support.

I additionally **OBJECT** to the "**implication**" by the U.S. Attorney there may have been conversations between myself, Linda Sullins and Defendant Larry Goodyke regarding "some type of tax shelter promotion or sales". I, nor to the best of my knowledge, Linda Sullins ever spoke with Defendant Goodyke regarding any tax shelter promotions or sales. I will **not** participate in any "**illegal**" tax shelter promotion or sales! Furthermore, in Section 3 the U.S. Attorney states, "Based on the interviews with the FBI and discussions with the government about the trial subpoenas, Mr. Knapp had a **significant number** of conversations with Defendant Goodyke about the identification cards," I **maintain** to the **best of my recollection**, I have had **limited conversations and emails** with Defendant Goodyke regarding the identification cards.

I believe the U.S. Attorney has **obfuscated** some of the facts regarding my statements in this case. I **reassert** that **in fact**, it would be a hardship to leave Alaska during my limited time with my Grandkids, (this trip was booked in May with **NO knowledge** of any impending subpoena) and if I had **any further information germane** to this case, I would **gladly appear** to testify at this trial!

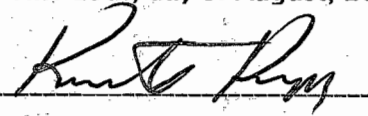
Finally, the question presented in Section A) in the MEMORANDUM IN SUPPORT regarding the "**legal**" validity of the subpoena was never addressed.

So sworn under penalty for perjury, and

Respectfully Submitted,

This 19th, day of August, 2009

By /s/



Kenneth Knapp
P.O. Box 775092
Steamboat Springs, CO 80477

Page Three

CERTIFICATE OF SERVICE

I do hereby certify that I have caused true copy of the foregoing – **“OBJECTIONS TO THE GOVERNMENT’S SUGGESTIONS IN RESPONSE TO MOTION TO QUASH SUBPOENAS ISSUED TO KENNETH KNAPP AND LINDA SULLINS** to be sent via U.S. mail, postpaid, to the following parties:


J. Daniel Stewart
Assistant United States Attorney,
U.S. Attorney’s Office
400 East Ninth Street, Fifth Floor
Kansas City, Missouri 64106

Ann Thompson, Clerk’s Office
Charles Evans Whittaker Courthouse
400 E. 9th Street
Kansas City, Missouri 64106

So Sworn, and Done,

This 19th Day of August, 2009

By /s/


Kenneth Knapp
P.O. Box 775092
Steamboat Springs, CO 80477